

To: Rodriguez, Dante[Rodriguez.Dante@epa.gov]
From: Jeryl Gardner
Sent: Mon 5/22/2017 5:19:56 PM
Subject: FW: Status of Anaconda ROD review?

.....
>>>>>

In lieu of not receiving Jeff's thoughts yet.

Jeryl R. Gardner, P.E., C.E.M.

Abandoned Mine Lands Program Manager

Bureau of Corrective Actions, NDEP
901 S. Stewart St., Ste 4001
Carson City, NV 89701
775-687-9484
jgardner@ndep.nv.gov



From: Jeryl Gardner
Sent: Monday, May 22, 2017 8:31 AM
To: Jeff R. Collins
Subject: FW: Status of Anaconda ROD review?

FYI: OU-8 ROD review and comments (see email below) by EPA HQ.

I don't view these comments as major, but do require some type of response.

My suggestions, and see what you think:

1. The lower drain-down HLPs may not show risk outside of the risk range, but the closure of all HLPs, with a site-wide stormwater system to control runoff and runoff cannot be implemented without closing all HLPs. Also, even the Group A (non-cancer risk) HLPs draindown solutions showed exceedances above MCLs for eight metals.

2. The two different closure methods are part of two different alternatives. Alternatives 2 and 3 stated that some of the pond solids would be left in place, whereas in Alternative 4, the pond solids will either be removed and reprocessed, or closed in place. Alternative 4 expanded on Alternatives 2 and 3 potential options for pond solids.

Thoughts?

Thanks,

Jeryl R. Gardner, P.E., C.E.M.

Abandoned Mine Lands Program Manager

Bureau of Corrective Actions, NDEP
901 S. Stewart St., Ste 4001
Carson City, NV 89701
775-687-9484
jgardner@ndep.nv.gov



From: Legare, Amy [<mailto:Legare.Amy@epa.gov>]
Sent: Monday, May 22, 2017 4:30 AM
To: Rodriguez, Dante <Rodriguez.Dante@epa.gov>; Poore, Christine <Poore.Christine@epa.gov>
Cc: Dave Davis (drdavis@blm.gov) <drdavis@blm.gov>; Jeryl Gardner <JGARDNER@ndep.nv.gov>
Subject: RE: Status of Anaconda ROD review?

We have been up to our ears putting together materials and briefings for “Kell” Kelly, assistant to the administrator, on every aspect of the Superfund program. I finally got my comments typed in and sent to Christine late Friday.

My 2 biggest issues are: (1) some of the HLPs don’t show risk outside of the risk range, what is the trigger for action for those HLPs? (2) In one place the document states that the solids will be left behind, unaddressed, but in other places solids will be removed and reprocessed or closed in the 4-acre Pond. Which is it?

From: Rodriguez, Dante
Sent: Friday, May 19, 2017 3:11 PM
To: Poore, Christine <Poore.Christine@epa.gov>; Legare, Amy <Legare.Amy@epa.gov>
Cc: Dave Davis (drdavis@blm.gov) <drdavis@blm.gov>; Jeryl Gardner <JGARDNER@ndep.nv.gov>
Subject: Status of Anaconda ROD review?

Christine and Amy,

Will you guys be sending me HQ’s comments on my draft ROD for Anaconda today? Last week you had indicated that you were delayed until this week. We expect a long approvals process with BLM/DOI involved, so time is becoming tight. Please give me an update – hope to see it today. Thanks!

Dante Rodriguez

Remedial Project Manager

U.S. EPA Region 9

75 Hawthorne Street, SFD-8-2

San Francisco, CA 94105

(415)972-3166